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To: Barajas-Ochoa_Esther@OEHHA
Subject: Glyphosate NSRL (No Significant Risk Level)
Date: Saturday, June 17, 2017 12:19:49 PM

TO: OEHHA; Cal/EPA

RE: Glyphosate NSRL

I was present at the hearing in Sacramento on June 7, 2017. I actively listened to the wide array of speakers, some of whom travelled by car or plane to voice their concerns about the health risks of glyphosate in 3-5 minutes.

I share those concerns. I am a Board Certified Internist practicing in California. We are experiencing a health crisis in this country. There are many causes of the current health crisis, but I believe that pesticides are a significant factor. Glyphosate is the most pervasive herbicide in California, with more than 10 million pounds applied each year. In my opinion, a toxic substance like glyphosate should have extensive testing done on humans before allowing it to be sprayed pervasively, leaving most Californians exposed without choice. Setting the NSRL at 1100 micrograms/day is a cause for concern since that level cannot be enforced due to the fact that people don't know how much glyphosate is in the food they eat. Glyphosate has been found in many different foods, as well as vaccines, ground water and surface water. Since there is no (reliable) agency that tests (and labels) levels of glyphosate in food, the amounts ingested (breathed or injected) can vary greatly. Of course, children are particularly vulnerable.

What I witnessed at the hearing was the possibility of democracy at work. I am hopeful that OEHHA will seriously consider the concerns of average California citizens, and not allow the corporate giant Monsanto to threaten them.

Like many other voices, I believe that the NSRL should be zero, since there is no need to risk using a toxic chemical when there are safer alternatives.

At the hearing, Monsanto was represented by a senior toxicologist, Donna Farmer and two other representatives. They stated that glyphosate is not associated with cancer and is safe. They refuted IARC's study because it was not confirmed by another study. The IARC, is an objective organization and determined that glyphosate is a probable human carcinogen.

The main problem with "science" as it stands now is that the safety studies weren't conducted in a conclusive or unbiased way. Monsanto's studies have been non-transparent, and there are problems with its reliability and authenticity. Monsanto cannot be trusted with its scientific studies because it has billions of dollars at stake and a very poor track record for using extremely toxic substances on masses of people; DDT and Agent Orange are just two examples.

Concerned citizens and farmers are victims of an unofficial human experiment without a researcher. Glyphosate is a toxic substance, used to kill weeds (a variety of plants). Who conducts the study on how this toxic substance affects humans? To really understand the science, one would need to follow humans who ingest glyphosate and humans who don't ingest glyphosate over time and compare them. They would need to be observed for years because cancers and other chronic health issues may take years to develop. It doesn't appear that Monsanto has any interest in doing such a study.

OEHHA, Cal/EPA did the right thing putting glyphosate on the Prop 65 list which informs Californians of substances known to be carcinogenic (usually by signs or labels posted on buildings or products.) Unfortunately, Monsanto is suing the state of California for that action.

Until real objective science can prove that glyphosate is safe for human consumption, it should be banned.

I hope you will take the courageous step to ban glyphosate.

Sincerely,

Tiffany Baer, MD

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